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REMARKS

In the Office Action, the Examiner rejected Claims 1-17, which were all of the then pending claims, under 35 U.S.C. 102 and under 35 U.S.C. 112. The claims were rejected under 35 U.S.C. 102 as being fully anticipated by U.S. patent application publication no. 2004/0213233 (Hong, et al.), and the claims were rejected under 35 U.S.C. 112 as failing to comply with the enablement requirement.

The rejection of the claims under 35 U.S.C. 112 is respectfully traversed. Independent Claims 1, 6 and 11 are being amended to better define the subject matters of these claims, and new Claim 18, which is dependent from Claim 1, is being added to describe preferred features of the invention. Also, the specification is being amended to provide a more express support for the exact language used in Claims 4, 5, 9, 10, 14, 15 and 17.

For the reasons presented below, all of Claims 1-18 satisfy the requirements of 35 U.S.C. 112 and patentably distinguish over the prior art. Accordingly, the Examiner is requested to reconsider and to withdraw the above-identified rejections of Claims 1-17 under 35 U.S.C. 102 and 112, and to allow these claims and new Claim 18.

The present invention relates to procedures for providing routers with filters, which are sets of rules that determine how the routers transmit data. As discussed in detail in the instant application, occasionally, after a network has been designed and implemented and is in use, a filter may be written specifically for the network. These specifically written filters may not be very effective, or may actually have adverse unintended consequences.

The present invention addresses this problem by providing a router with a better, substitute filter for such a specifically written filter. More particularly, in the operation of the preferred embodiment of this invention, a set of pre-written standardized filters are provided.

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Then, when a user or administrator writes a filter specifically for a router in a network, a program is run on a computer to identify one of the pre-written filters as a substitute for the non-standard filter that was specifically written for the router.

That identified substitute filter is loaded onto the router and used instead of the filter that had been specifically written for the router. Preferably, a predefined test is used to identify which one of the pre-written standardized filters most closely matches the filter written specifically for the router.

In rejecting the claims under 35 U.S.C. 112, the Examiner argued that the specification does not adequately disclose how the substitute filter is identified. In particular, the Examiner argued that the process of matching the pre-written filter files with the specifically written filter is not defined in the specification, nor is a pre-defined test for carrying out this process. The Examiner also noted that the predefined set of criteria in Claims 4, 9, 14 and 17 is not supported in the specification.

In response to this latter point, Applicant is herein amending the specification, on page 2, to provide a more express support for the exact language used in Claims 4, 9, 14 and 17. This portion of the specification is also being amended to include a more express support for the specific terminology used in Claims 5, 10 and 15.

With respect to the issue of enablement, Applicant respectfully disagrees with the Examiner. The specification, on page 5, line 5-10, specifically addresses this issue. In particular, the specification explains that any suitable criteria and process may be used to identify which one of the pre-written filters most closely matches the specifically written filter. It is important to note that is important is not how the match is made, but that a match is made. The exact criteria, test or procedure used to do that is not critical. Any suitable

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process may be used, and those of ordinary skill in the art would be able to develop a procedure, within the scope of the present invention, to find an appropriate match.

In light of the above-discussion and the amendment made herein to the specification, all of Claims 1-17 are supported in and enabled by the specification. The Examiner is thus respectfully asked to reconsider and to withdraw the rejection of Claims 1-17 under 35 U.S.C. 112.

Moreover, Claims 1-17, as well as new Claim 18, patentably distinguish over the prior art because the prior art does not disclose or suggest searching through pre-written filters for one that matches a specifically written filter, and which can then be used as a substitute for that specifically written filter, as described in independent Claims 1, 6 and 11.

For example, Hong, et al, which is the only reference relied on by the Examiner for the rejection of the claims, describes a system for determining routing in an asynchronous transfer mode communication network. In this system, various possible transfer routes are identified in a routing table. Figure 9 of Hong, et al. shows a procedure for forming a new routing table, which may be done when the network topology changes. In this procedure, when the network topology changes, a work flow management unit recognizes that a routing reconstruction is needed, and such a table is then formed. As indicated in the Abstract of Hong, et al, routing entries in the routing table may be aligned by the order of total cost assigned to the entries.

There is, thus, an important difference between the present invention and the system disclosed in Hong, et al. Specifically, Hong, et al. does not compare a given filter with pre-written filters – that is, filters written before that given filter is written – to identify a match for that given filter. Instead, with Hong, et al. new routes are identified after the network topology changes.

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The above-discussed feature of the present invention is useful for a number of reasons. For example, as explained in the present application, the approach of this invention enables a given filter to be compared and replaced right away with a better filter that may be better suited for the network.

Independent Claims 1, 6 and 11, describe this aspect of the present invention. In particular, each of these claims describes the feature that the pre-written filters, from which a match may be made, were written before the specifically written filter was written.

The other references of record have been reviewed, and these other references, whether considered individually or in combination, also do not disclose or suggest this feature. In particular, the prior art does not disclose or suggest the procedure for identifying and using a pre-written filter, as describe above, as a substitute for a specifically written filter, as described in independent Claims 1, 6 and 11.

Because of the above-discussed differences between Claims 1, 6 and 11 and because of the advantages associated with those differences, it cannot be said that any of these claims 1, 6 and 11 is anticipated by or is obvious in view of the prior art. Accordingly, Claims 1, 6 and 11 patentably distinguish over the prior art and are allowable. Claims 2-5 and 16-18 are dependent from, and are allowable with, Claim 1. Similarly, Claims 7-10 are dependent from Claim 6 and are allowable therewith; and Claims 12-15 are dependent from, and are allowable with, Claim 11. The Examiner is, consequently, also asked to reconsider and to withdraw the rejection of Claims 1-17 under 35 U.S.C. 102, and to allow these claims and new Claim 18.

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For the reasons advanced above, the Examiner is requested to reconsider and to withdraw the rejections of Claims 1-17 under 35 U.S.C. 102 and 112, and to allow Claims 1-18. If the Examiner believes that a telephone conference with Applicant's Attorneys would be advantageous to the disposition of this case, the Examiner is requested to telephone the undersigned.

Respectfully Submitted,

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